

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

MAR 1 2 1997

Elizabeth Birch, Treasurer Human Rights Campaign Fund Political Action Committee 1101 14th Street, N.W., 2nd Floor Washington, DC 20005

Identification Number:

C00235853

Reference:

October Monthly Report (9/1/96-9/30/96)

Dear Ms. Birch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses the aggregate year-to-date total for Michael Leppen to be \$13,000. However, it appears that the receipt of previous contributions from this individual have not been reported by your committee. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year. In the event that this aggregate year-to-date total is correct, please amend the report(s) covering the period during which the previous contributions were received to disclose the receipts.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in

HUMAN RIGHTS CAMPAIGN FUND POLITICAL ACTION COMMITTEE PAGE 2

writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on

HUMAN RIGHTS CAMPAIGN FUND POLITICAL ACTION COMMITTEE PAGE 3

Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

- -Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$44,284.66 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$34,284.66. Please amend your report to clarify the discrepancy.
- -For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Debbie Maryano
Debbie Manzano

Senior Reports Analyst

Reports Analysis Division

SCHEDULE A

For Line Number 11(a)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTE	E (in full):	Human Rights	Campaign
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NAME OF COMMITTEE (in full): Ru	oman Rights Campaign		
Leppen, Michael	Employer:		
3800 N. Lake Shore Dr.	Hoover Retates		
	Occupation:		
Chicago, IL 60613-3313	Office Manager		
·	Aggregate to Date:		
_	913,000.00	Date:	Amount
-		9/4/96	2,500.00
Snider, Blake	Employer:		
3724 Winding Creek Rd	Suburban Ford		
<u>-</u>	Occupation:		
Sacramento, CA 95864-1533	Auto Dealer		
	Aggregate to Date:		
	\$2,500.02	Date:	Amount
	•	9/25/96	\$416.67
Carlson, Lois	Employer:		
3526 Humboldt Avenue S	Self-Employed		
	Occupation:		
Minneapolis, MN 55408-3316	·Broker		
_	Aggregate to Date:		
	. \$2,500.00	Date:	Amount
		9/23/96	\$500.00
Colton, Laurence	Employer:		
9 Leeward Rd	Goldman Insurance		
	Cocupation:		
Belvedere , CA 94920-2320	Insurance Broker		
	Aggregate to Date:		
	\$2,400.00	Date:	Amount
		9/26/96	1,200.00
Sherman, Lisa	Employer:		
2130 N Monroe St	Bell Atlantic		
•	Occupation:		
Arlington, VA 22207-3802	Financial Operat		
•	Aggregate to Date:		
	\$2,083.30	Date:	Amount
		9/30/96	\$208.33
<u> </u>		9/30/96	\$208.33
Wong Jacqueline 4000 Cathederal Ave, NN	Employer:	•	
Apt 513B	Occupation:		
	Aggragate to Date:		
	\$1,800.00	Dater	Amount

9/4/96

Subtotal this page:

1,800.00

\$16,833.33

SCHEDOLE A

For Line Number 11(a)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

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Dickinson, Todd 2212 Lombard St	Employer:		
	Occupation:		
Philadelphia, PA 191461108			
	Aggregate to Date:		
	\$500.00	Date	Amount
		3/7/96	\$500.00
Leppen, Michael	Employer:		
PO Box 330			
	Occupation:		
Glencoe, IL 600220330	_		
	Aggregate to Date:		
٥.	\$500.00	Date:	Amount
		<u> 3/15/96</u> _	\$500.00
Michael, Sally	Employer:		-
951 S Scott St			
2	Occupation:		
** Arlington, VA 222044526			
vo	Aggregate to Date: \$500.00		2
ч	90.00	Date:	Amount
ാ		3/7/96 3/21/96	\$100.00 \$100.00
	Employer:	. 3/61/20 _	
Schrum, Edward 25111 Natama Court	Home Life Nursing,	Ť m	
)	Occupation:	23 1	
Laguna Hills. CA 926535607	CEO		
37	Aggregace to Date:		
5 k	\$500.00	Date:	Amount
		3/29/96	
Fryer, Clara	Employer:		_ =
802 Vedado Way NE			
•	Occupation:		
Atlanta. GA 303081726			
	Aggregate to Date:		
	\$450.00	Date:	Amount
		3/27/96	\$150.00
Ogrino, Mike	Employer:		
490 Douglass St			
	Occupation:		
San Francisco, CA 941142761			
	Aggregate to Date:		
	\$450.00	Date:	
	· - <i>·</i> - · - · - · -	3/27/96	\$150.00
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Subtotal this page:

\$1,700.00

SCHEDULE 9

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NEW	DELEANS, LA 70130	Other (specify)		•
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DET	KDIT, MI 40231-1857	Other (specify)		<u> </u>
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		Other (specify)	Claim (models.	Amount of Section
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1 80	BOX 518	Disbursement let: Primary DC Commit	9/27/96	500
UAN	N CITY, NJ 07087	Other (aspectity)		
	ne, Maling Address and 20° Code	Propose of Contractored HD HT-#2	Date (marth,	Amount of Bach Staburgerant This Peril
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LWIN	Box 4452	POLITICAL CONTRIBUTION	9/27/96	500.05
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Total	NOLVER FOR CONSIDERS	1 - '	gray, years)	
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	Carolyn McCarthy for Congress P.O. Box 190 Mineola, NY 11501	Political Contribution		\$2,500
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	P.O. Gox 371125	Political Continue TOA District Continue To Top Continue Contract Continue Top Continue Contract Contract Continue Contract C	818196	\$1,000
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l	John Olver for Congress P.O. Box \$197 Amherst, MA 01004	Pelitical Contribution Discussion on Primary Bound Contribution	818196	\$1,500
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	David Skaggs for Congress	Political Contribution	8/8/96	\$1,000
	Westminister CO 20030	Purpose of Distance and S - KS	Date (marth, day, year)	Avecast of Each Distance over This Peaked
	FO Box 358	Potitical Contribution Character for the Forest & General Character (special)		\$2,500
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	Mike Ward for Congress	Charles In: Princy & Sures	8/8/96	\$2,500
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	Rick 2 but for Congress 3476 Spring Street	Distriction Control by Garan	8/14/96	\$843.55
	LUNG BLACK CA 90806	Purpose of Cinturnament H.D. P.41-18	- SPREE (alloway)	Arrount of Each Statement this Period
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